

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FAIR FIGHT ACTION, INC, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

Civ. Act. No. 18-cv-5391 (SCJ)

**PLAINTIFFS' SUPPLEMENTAL STATUS UPDATE PURSUANT TO
THE COURT'S JANUARY 9, 2020 ORDER (ECF No. 194)**

Plaintiffs submit this Supplemental Status Report to update the Court on a development that occurred yesterday afternoon. Shortly after 5:00 p.m., Plaintiffs received an email from Mr. Belinfante about the 238,000 pages of “training materials” that Defendants produced on Wednesday, January 15, 2020. According to the email, Defendants learned, after the production, that at least some documents in the production predate the relevant discovery time-period or are otherwise irrelevant. Mr. Belinfante proposed a “re-production” of the documents to exclude the irrelevant documents or an identification of Bates number of the documents to be excluded.

But, nothing in Mr. Belinfante’s email addresses the fact that these documents were requested months ago in Plaintiffs’ First Request for Production

of Documents (served July 15, 2019). Moreover, nothing in Mr. Belinfante's email addresses the further delay occasioned by Defendants failure to properly produce the documents – even at this late date. And, finally, nothing in Mr. Belinfante's email addresses Defendants' proposed (and wholly unacceptable) date of February 28, 2020—six weeks from now and three and a half months after the close of fact discovery—for the completion of Defendants' document production.

Respectfully submitted this 17th day of January, 2020.

/s/Leslie J. Bryan

Allegra J. Lawrence (GA Bar No. 439797)

Leslie J. Bryan (GA Bar No. 091175)

Maia Cogen (GA Bar No. 832438)

Suzanne Smith Williams (GA Bar No. 526105)

LAWRENCE & BUNDY LLC

1180 West Peachtree Street

Suite 1650

Atlanta, GA 30309

Telephone: (404) 400-3350

Fax: (404) 609-2504

allegra.lawrence-hardy@lawrencebundy.com

leslie.bryan@lawrencebundy.com

maia.cogen@lawrencebundy.com

suzanne.williams@lawrencebundy.com

Thomas R. Bundy (Admitted *pro hac vice*)

LAWRENCE & BUNDY LLC

8115 Maple Lawn Boulevard

Suite 350

Fulton, MD 20789

Telephone: (240) 786-4998

Fax: (240) 786-4501

thomas.bundy@lawrencebundy.com

Dara Lindenbaum (Admitted *pro hac vice*)
**SANDLER REIFF LAMB ROSENSTEIN &
BIRKENSTOCK, P.C.**

1090 Vermont Avenue, NW
Suite 750
Washington, DC 20005
Telephone: (202) 479-1111
Fax: 202-479-1115
lindenbaum@sandlerreiff.com

Elizabeth Tanis (GA Bar No. 697415)
John Chandler (GA Bar No. 120600)
957 Springdale Road, NE
Atlanta, GA 30306
Telephone: (404) 771-2275
beth.tanis@gmail.com
jachandler@gmail.com

Kurt G. Kastorf (GA Bar No. 315315)
THE SUMMERVILLE FIRM, LLC
1226 Ponce de Leon Avenue, NE
Atlanta, GA 30306
Telephone: (770) 635-0030
Fax: (770) 635-0029
kurt@summervillefirm.com

Matthew G. Kaiser (Admitted *pro hac vice*)
Sarah R. Fink (Admitted *pro hac vice*)
Scott S. Bernstein (Admitted *pro hac vice*)
Norman G. Anderson (Admitted *pro hac vice*)
KAISERDILLON PLLC
1099 Fourteenth Street, NW
Eighth Floor West
Washington, DC 20005
Telephone: (202) 640-2850
Fax: (202) 280-1034
mkaiser@kaiserdillon.com
sfink@kaiserdillon.com
sbernstein@kaiserdillon.com
nanderson@kaiserdillon.com

Andrew D. Herman (Admitted *pro hac vice*)
Nina C. Gupta (Admitted *pro hac vice*)
MILLER & CHEVALIER CHARTERED
900 Sixteenth Street, NW
Washington, DC 20006
Telephone: (202) 626-5800
Fax: (202) 626-5801
aherman@milchev.com
ngupta@milchev.com

Kali Bracey (Admitted *pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue, NW
Suite 900
Washington, DC 20001
Telephone: (202) 639-6000
Fax: (202) 639-6066
kbracey@jenner.com

Jeremy H. Ershow (Admitted *pro hac vice*)
JENNER & BLOCK LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 891-1600
Fax: (212) 891-1699
jershow@jenner.com

Von A. DuBose
DUBOSE MILLER LLC
75 14th Street N.E., Suite 2110
Atlanta, GA 30309
Telephone: (404) 720-8111
Fax: (404) 921-9557
dubose@dubosemiller.com

Johnathan Diaz (Admitted *pro hac vice*)
Paul M. Smith (Admitted *pro hac vice*)
CAMPAIGN LEGAL CENTER

1101 14 St. NW Suite 400
Washington, DC 20005
Telephone: (202)736-2200
psmith@campaignlegal.org
jdiaz@campaignlegal.org

*Counsel for Fair Fight Action, Inc.; Care in
Action, Inc.; Ebenezer Baptist Church of Atlanta,
Georgia, Inc.; Baconton Missionary Baptist
Church, Inc.; Virginia-Highland Church, Inc.; and
The Sixth Episcopal District, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this, the 17th day of January 2020, I electronically filed the foregoing **PLAINTIFFS' STATUS UPDATE PURSUANT TO THE COURT'S JANUARY 9, 2020 ORDER (ECF No. 194)** with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to Counsel of Record:

Chris Carr, Esq.
Attorney General
Dennis Dunn, Esq.
Deputy Attorney General
Russell Willard, Esq.
Senior Assistant Attorneys General
Georgia Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334
Telephone: (404) 656-3300
Fax: (404) 657-8733
ccarr@law.ga.gov
ddunn@law.ga.gov
rwillard@law.ga.gov

Bryan P. Tyson, Esq.
Bryan Jacoutot, Esq.
Diane Ross, Esq.
Special Assistant Attorneys General
Taylor English Duma LLP
1600 Parkwood Circle
Suite 200
Atlanta, GA 30339
Telephone: (678) 336-7249
Fax: (404) 856-3250
btyson@taylorenghish.com
bjacoutot@taylorenghish.com

Joshua Barrett Belinfante, Esq.

Brian Edward Lake, Esq.

Carey Allen Miller, Esq.

Vincent Robert Russo, Jr., Esq.

Alexander Denton, Esq.

Robbins Ross Alloy Belinfante Littlefield, LLC -Atl

500 Fourteenth Street, NW

Atlanta, GA 30318

Telephone: (678) 701-9381

Fax: (404) 856-3250

jbelinfante@robbinsfirm.com

blake@robbinsfirm.com

cmiller@robbinsfirm.com

vrusso@robbinsfirm.com

adenton@robbinsfirm.com

/s/Leslie J. Bryan

Leslie J. Bryan

Georgia Bar No. 091175